

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

James A. Reynolds and Tiffany M. Reynolds

CHAPTER 13

CASE NO. 1 - 8 -bk- 01044-HWV

Debtor(s)

Mill City Mortgage Loan Trust 2016-1,
Wilmington Savings Fund Society, FSB, d/b/a
Christiana Trust as Trustee

ADVERSARY NO. - -ap-
(if applicable)

Plaintiff(s)/Movant(s)

vs.

James A. Reynolds and Tiffany M. Reynolds

Nature of Proceeding:

Defendant(s)/Respondent(s)

Document #: 54

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Request for continuance of 30 days for further review

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 09/16/2019

Michael J. Shavel, Esquire

Attorney for Movant

Name: Hill Wallack LLP

Phone Number: 215-579-7700

¹ No alterations or interlineations of this document are permitted.